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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In re:
10 NORTHWEST TERRITORIAL MINT, LLC,
11
12 Debtor.

Case No. 16-11767-CMA

TRUSTEE'S *EX PARTE* MOTION TO
ESTABLISH NOTICE PROCEDURES
FOR CASE DISMISSAL

13 Mark Calvert, the Chapter 11 Trustee (the "Trustee") respectfully requests that the Court
14 establish notice procedures with respect to the Trustee's forthcoming motion for an order dismissing
15 this Bankruptcy Case and granting related relief ("Dismissal Motion") pursuant to Federal Rules of
16 Bankruptcy Procedure 2002(a) and 9006 and LBR 9013-1(d)(3). In support of this Motion, the
17 Trustee respectfully states as follows:

18 1. On April 1, 2016, Northwest Territorial Mint, LLC (the "Debtor") filed a voluntary
19 bankruptcy petition under Chapter 11 of Title 11 of the United States Code. The Court ordered the
20 appointment of a trustee and the Chapter 11 Trustee, Mark Calvert, was appointed on April 11, 2016.

21 2. The Trustee is nearing the end of the administration of the case. The Trustee has
22 liquidated the vast majority of the assets of the estate. The Trustee has resolved and paid all secured
23 claims and all administrative claims other than allowed administrative claims for compensation of
24 the Trustee and his professionals.
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TRUSTEE'S *EX PARTE* MOTION TO ESTABLISH
NOTICE PROCEDURES- 1

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1 3. The Trustee responded to document production subpoenas and testified at trial on
2 July 26 and 27, 2021 in the criminal case of Ross Hansen and Diane Erdmann. The criminal case
3 concluded on July 30, 2021.

4 4. The Trustee is prepared to file the Dismissal Motion.¹ At the status conference held
5 by the Court on April 2, 2021, the Court indicated that it would consider whether a motion to dismiss
6 should be noticed to the limited notice list or to the full mailing matrix. The estimated cost of
7 service upon the full mailing matrix is \$3,500.

8 5. By this motion, the Trustee requests that the Court establish notice procedures and
9 limit notice of the Motion to Dismiss to the Special Notice List as defined in the Amended Case
10 Management Order (Dkt. 232). The Trustee will provide notice of the Motion to Dismiss in
11 compliance with the time limitations provided in LBR 9013-1.

12 DATED this 5th day of August, 2021.

13
14 K&L GATES LLP

15
16 By /s/ Michael J. Gearin
17 Michael J. Gearin, WSBA #20982
18 David C. Neu, WSBA #33143
19 Brian T. Peterson, WSBA #42088
20 Attorneys for Mark Calvert, Chapter 11 Trustee

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25 _____
26 ¹ The Trustee intends to note the hearing on the Motion to Dismiss for the Court’s regularly scheduled calendar on
September 24, 2021.

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on August 5, 2021, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

Also on August 5, 2021, she caused the foregoing document to be mailed to the Parties at the addresses listed below:

Northwest Territorial Mint LLC
PO Box 2148
Auburn, WA 98071

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 5th day of August, 2021 at Lynnwood, Washington.

/s/ Denise A. Lentz
Denise A. Lentz